

November 14, 2005

Mr. Arthur Neal
Director of Program Administration
Natin Organic Program
United States Department of Agriculture
1400 Independence Avenue, S. W.
Washington, DC 20250
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Reference Docket Number TMD-04-01, Peracetic acid/ peroxyacetic acid

Dear Sir,

We are an organic fluid milk processor. We have found peroxyacetic acid to be a very effective sanitizer. We have also found that peroxyacetic acid is very safe from an employee standpoint. This product is also safe when considered in the waste stream.

Peroxyacetic acid should retain its status as an allowed synthetic for use as a sanitizer in an organic or 100% organic product under §205.605(b). This chemical was extensively reviewed by the NOSB and received a 14-0 vote for inclusion as a sanitizer on surfaces in contact with organic food. NOSB found the product to be consistent with the evaluation criteria

The sanitizer is a free draining aqueous solution that degrades into acetic acid and water upon use. Acetic acid is considered GRAS, and allowed for use in organic production and handling, and I am sure that water is not considered a problem. Peroxyacetic acid is certainly is not considered an ingredient, at the most it would be a processing aid or a food contact substance. The concern that was expressed in the proposed rule about confusion of the name of the chemical and its usage could certainly be addressed by using the term peroxyacetic acid and parenthetical peracetic acid, and directions for use according to federal regulations. That type of wording and expectation for following other regulations is common throughout regulatory documents.

Although I do not have direct experience with the other applications of peroxyacetic acid USDA should include clearances for the use of this substance in livestock production for the reasons in the previous paragraphs.

Thank you for review and consideration of these comments.

Respectfully Submitted,

Marcia McGlochlin
Regulatory Affairs

Clover Stornetta Farms